

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

Scanned-IP

Initial Inspection: Yes No Follow-up Inspection: Yes No Complaint: Yes No
 Hazardous Waste: LDF () TSF () GEN () KG () SQ () UNV () NOT A GEN () OTHER ()
 Used Oil: UOG () UOT () UOM () UOP () UOB ()
 Solid Waste: SLF () TRS () CDL () ILF () YWC () SWP () HHW () OBS () MTP () WTM () WTP () WTR () WTT ()

TO: WbH Creek Generating Station 2 / 16 / 11
 Facility Name
1550 Oxen Lane Burlington KS 66839 Coffey
 Address City State Zip Code County

K5D000686956

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☐ Violations As Follows☒ No Violations IdentifiedCitationDescription of Violation☐ Other Comments/Concerns:1-12-00
5

508743



RCRA

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within _____ days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:

Kansas Department of Health and Environment
 Southeast District Office
 Waste Management Program
 1500 W. 7th
 Chanute, Kansas 66720-9701

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (620) 431-2390 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

Wendy A. RoseDate 2 / 16 / 11

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: LAUTAM SENSignature: [Signature]Title: Manager Regulatory AffairsDate 2 / 16 / 11

COPIES: White-Facility; Yellow-Bureau of Waste Management; Blue-District

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES

HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

Facility Information

EPA/ ID/Permit No. KSD 000 686 956 Number of Employees 1,000
Facility Name Wolf Creek Generating Station District Southeast
Street 1550 Oxen Lane City Burlington ,KS ZIP 66839
Mailing Address (if different than above) P.O. Box 411, Burlington, KS 66839
County Coffey e-mail doeccle@wcnoc.com
Phone 620-364-8831 Cell Phone None Fax 620-364-4154

Operating Hours and Days 24 Hours Per Day, 7 Days Per Week, 52 Weeks Per Year.

Type of Business Nuclear Power Generating Plant

Were GPS coordinates previously taken for this facility and recorded in the appropriate database?

☐ Yes ☒ No

If no, did you take the GPS coordinates for this facility and record them in the appropriate database

☐ Yes ☒ No

Generator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☐ EPA Generator
☐ Not a Generator ☒ Kansas Generator ☐ Transporter

If the facility is inactive and/or closed, please provide an explanation under Facility Description.

Other Regulated Activities: ☒ T/S/D Facility ☐ Tank System ☐ Subpart BB
(Complete applicable reports) ☐ Universal Waste Activities

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☒ Yes ☐ No ☐ NA

If yes, then the facility is subject to SPCC requirements due to used oil activities.

Does the facility have a SPCC Plan? ☒ Yes ☐ No ☐ NA

Did you inform the facility they are subject to SPCC ☐ Yes ☐ No ☒ NA

Facility Used Oil Activities (Attach a checklist for each one marked):

☒ Generator ☐ Collection Center / Aggregation Point
☐ Transporter / Transfer Facility ☐ Used Oil Processor / Re-Refiner
☐ Used Oil Burner (Off-Spec Fuel) ☐ Used Oil Marketer

No Used Oil Activities ☐

Inspection Information

☒ Routine ☐ Complaint

Inspection Time 10:30 a.m. Date(s) February 15 and 16, 2011

Name of person completing this report: Wesley A. Page

Inspection Participants:

Include name of	Participated In (Check all that

inspector(s)		Co./Agency	apply)				Comments
Name	Title		Intro Meeting	Walk-Through	Records Review	Exit Briefing	
Wes Page	Environmental Scientist	KDHE	X	X	X	X	
Don Eccles	Senior Environmental Biologist	Wolf Creek Generating Station	X	X	X	X	
Gautam Sen	Manager Regulatory Affairs	Wolf Creek Generating Station				X	

Has the company declared any information/processes as trade secrets KSA 65-3447? ☐ Yes ☒ No
If yes, explain:

Facility Description: (# of buildings, approximate size of each building, basic activity in each building, processes, etc.):

The facility consists of several buildings located on 250 acres, but only nine buildings are associated with hazardous waste activities. The facility has one secured access point and the entire 250 acre site is secured by fencing, security cameras, and armed security guards.

Has this facility been previously inspected by EPA and/or KDHE? ☒ Yes ☐ No
If yes, please summarize the following:

Date	Agency	Description of Violation (do not need to include reg. citations or comments)
08-18-04	KDHE	No Violations.

Please provide a brief description of any significant process, waste, management, ownership, or other pertinent changes since the previous inspection:

On October 7, 2004, the facility submitted an updated Notification of Regulated Waste Activity to the Topeka Central Office, changing their generator status from Large Quantity Generator to Kansas Generator. According to Mr. Eccles, waste minimization/reduction practices at the facility allowed for the change to Kansas Generator status.

Exit Conference:

Date of Exit Conference: February 16, 2011

Were all violations, comments, corrective actions, and response due dates discussed with the facility if applicable? ☐ Yes ☐ No

Was the possibility of additional violations and possible enforcement discussed with the facility? ☒ Yes ☐ No

Was the generator status and applicable regulatory requirements discussed with the facility during the exit briefing and/or previously during the inspection? ☒ Yes ☐ No

List of items provided to facility:

NOC/NONC ☒ Yes ☐ No
BWM CD ☐ Yes ☒ No
Container Posters ☐ Yes ☒ No
Other (list): _____

Summary of additional information presented to facility during exit conference:

List of Attachments:

#	Description of Attachments (List Photolog as last attachment if applicable)

Please include any additional information from this inspection here as long as it does not pertain to violations or comments:

Wolf Creek Generating Station operates an interim status storage facility for mixed waste generated. According to Mr. Eccles, no mixed waste has been stored in the facility's permitted mixed waste storage area for 13 years. Mr. Eccles also told me closure of the permitted Treatment/Storage/Disposal Facility (TSDF) has been discussed, but no action has been taken. At the time of my inspection, the permitted mixed waste storage area was empty and not being used.

Violations and Comments

Were Violations cited: ☐ Yes ☒ No
Were written comments made: ☐ Yes ☒ No

Provide a detailed description of each violation and comment, including photo references, attachment references, and regulatory citations below:

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION REPORT

GENERAL REQUIREMENTS (GGR)

YES NO NAV#

- | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|
| 1. Has the generator evaluated each potentially hazardous waste to determine if it is hazardous? KAR 28-31-4(b) [255] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| a. If waste was tested, was the analysis conducted by a laboratory certified by KDHE? KAR 28-31-4(b)(3)(A) [256] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. If waste was tested, are the results kept for three years from date the waste was last sent for on-site or off-site for treatment, storage or disposal? KAR 28-31-4(f)(1)(C) [257] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. If waste was not tested, did the generator use knowledge of the hazardous characteristics of the waste in light of the materials or processes used? KAR 28-31-4(b) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. If hazardous waste is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each special waste? KAR 28-29-109(c) [258] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. If the generator treats or recycles hazardous waste on-site (such as in a still), do they count waste each time prior to being treated or recycled? KAR 28-31-4(o) [259] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If the waste is not counted, is it exempt because of a closed-loop system? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

NOTIFICATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GGR)

- | | | | |
|---|-------------------------------------|--------------------------|--------------------------|
| 5. Has generator notified KDHE and obtained an EPA Identification Number? KAR 28-31-4(c)(1) (Mark NA only for SQG) [263] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Is current notification accurate? KAR 28-31-4(c)(1) [264] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

NON-ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

YES NO NAV#

- | | | | |
|---|--------------------------|--------------------------|-------------------------------------|
| 7. If the SQG is accumulating less than 55 pounds (25 kg.) of hazardous waste on-site, | | | |
| a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(3) [287] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Is the SQG sending this waste off-site for treatment, storage, or disposal? KAR 28-31-4(m)(3) [287] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

(If Non-Accumulating Small Quantity Generator, stop here)

ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

8. If the SQG is accumulating 55 pounds (25 kg.) or more of hazardous waste,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2) [268]** ☐ ☐ ☒
- b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? **KAR 28-31-4(m)(2) [269]** ☐ ☐ ☒

PRE-TRANSPORT REQUIREMENTS (GPT)

9. Does generator package **[273]**, label **[274]** (flammable liquid, poison, etc.), and mark **[275]** (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? **KAR 28-31-4(e) [276]** ☒ ☐
- a. Does the generator mark each container of 110 gallons or less as shown below? **KAR 28-31-4(e)(3)(B) [277]** ☒ ☐ ☐

*Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the US EPA.
Generator's Name and Address
Manifest Document Number*

10. Does the generator only use a transporter who has registered with KDHE and obtained an EPA Identification Number? **KAR 28-31-4(c)(2) [278]** ☒ ☐

Storage Requirements (GPT)

11. If the generator temporarily stores waste in containers,
- a. Is the accumulation start date marked on each container? **KAR 28-31-4(g)(2) [303] or KAR 28-31-4(h)(3) [291] or KAR 28-31-4(m)(2)(B) [282]** ☒ ☐ ☐
- b. Is each container clearly marked with the words "Hazardous Waste"? **KAR 28-31-4(g)(3) [304] or KAR 28-31-4(h)(4) [292] or KAR 28-31-4(m)(2)(B) [283]** ☒ ☐ ☐
- c. Are all containers holding hazardous waste in good condition **[305, 293, 284]** and closed **[306, 294, 285]** during storage except when necessary to add or remove waste? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)** ☒ ☐ ☐
- d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? **KAR 28-31-4(g)(1)(A) [307] or KAR 28-31-4(h)(2)(A) [295] or KAR 28-31-4(m)(2)(B) [286]** ☒ ☐
- A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? **KAR 28-31-4(k) [308, 296, 288]** ☒ ☐
12. If SQG or Kansas generator is accumulating 2,200 lbs. (1,000 kg.) or more of hazardous waste or 2.2 lbs (1 kg.) or more of acutely hazardous waste, then check yes and continue with EPA generator requirements. ☐ ☒

(If Accumulating Small Quantity Generator, <1,000 Kilograms, stop here)

STORAGE REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

YES NO NAV#

13. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? **KAR 28-31-4(g)(1)(A) [311] or KAR 28-31-4(h)(2)(A) [299]** ☒ ☐ ☐
14. Is EPA generator storing hazardous waste for 90 days or less? **KSA 65-3441(a)(2) [312]** ☐ ☐ ☒
15. Are containers holding ignitable or reactive waste(s) located at least 50 feet (15 meters) from the generator's property line? (EPA Generator Only) **KAR 28-31-4(g)(1)(A) [313]** ☒ ☐ ☐

If waste is managed in a tank system, complete the tank checklist. Complete Subpart BB checklist if organic waste contacts piping, valves, pumps, etc. (See 40 CFR 265.1050 for applicability)

SATELLITE ACCUMULATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

16. If the Kansas or EPA generator has satellite accumulation areas,
- Is 55-gallons or less of each waste stream **[317]** accumulated at or near the point of generation **[318]**, in one container **[319]**, which is under the control of the operator of the process generating that waste? **[320] KAR 28-31-4(j)(1)** ☒ ☐
 - Is each container in good condition **[321]** and closed except to add or remove waste? **[322] KAR 28-31-4(j)(1)(A)** ☒ ☐
 - Is each container marked with the words "Hazardous Waste"? **KAR 28-31-4(j)(1)(B) [323]** ☒ ☐
 - Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? **KAR 28-31-4(j)(2) [324]** ☒ ☐ ☐
 - Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? **KAR 28-31-4(j)(2) [325]** ☒ ☐ ☐

MANIFESTS REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GMR)

YES NO NAV#

17. If a contractual agreement is used in place of manifesting, (Kansas Generators only)
- Does the contractual agreement include the type of waste and frequency of shipments? **KAR 28-31-4(d)(7)(A) [329]** ☐ ☐ ☒
 - Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? **KAR 28-31-4(d)(7)(B) [330]** ☐ ☐ ☒
 - Is a copy of the agreement kept for a period of three years after termination of agreement? **KAR 28-31-4(d)(7)(C) [331]** ☐ ☐ ☒
18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1) [335]** ☒ ☐ ☐
- If yes, does each manifest include:
 - Generator EPA identification number (12-digit) **[336]** and a unique 5-digit manifest document number? **[337] KAR 28-31-4(d)(1)** ☒ ☐
 - Number of pages? **KAR 28-31-4(d)(1) [338]** ☒ ☐
 - Generator's name and mailing address? **KAR 28-31-4(d)(1) [339]** ☒ ☐
 - Generator's phone number? **KAR 28-31-4(d)(1) [340]** ☒ ☐
 - Each transporter's name? **KAR 28-31-4(d)(1) [341]** ☒ ☐
 - Each transporter's EPA identification number? **KAR 28-31-4(d)(1) [342]** ☒ ☐
 - Name and site address of designated facility? **KAR 28-31-4(d)(1)(A) [343]** ☒ ☐
 - Designated facility's EPA identification number? **KAR 28-31-4(d)(1) [344]** ☒ ☐

9. Waste description (DOT shipping name, hazard class, packing group and identification number)? **KAR 28-31-4(d)(1) [345]** ☒ ☐
- i. For waste using a "n.o.s." description, are the requirements of 49 CFR 172.203(k) met? **KAR 28-31-4(d)(1) [346]** ☒ ☐ ☐
10. Number **[347]** and type of containers? **KAR 28-31-4(d)(1) [348]** ☒ ☐
11. Total quantity? **KAR 28-31-4(d)(1) [349]** ☒ ☐
12. Unit (weight or volume)? **KAR 28-31-4(d)(1) [350]** ☒ ☐
13. Waste codes? **KAR 28-31-4(d)(1) [334]** ☒ ☐
14. Special handling instructions (if applicable)? **KAR 28-31-4(d)(1) [351]** ☒ ☐
15. Generator's certification including waste minimization statement **[352]** and the date signed by generator? **[354] KAR 28-31-4(d)(1)** ☒ ☐
16. Generator's signature? **KAR 28-31-4(d)(4)(A) [353]** ☒ ☐
17. Name **[355]**, signature **[356]**, and date **[357]** of initial transporter? **KAR 28-31-4(d)(4)(B)** ☒ ☐
- b. Does generator retain a copy of each initial manifest signed and dated by both generator and transporter? **KAR 28-31-4(d)(4)(C) [358]** ☒ ☐ ☐
(For 3 years **OR** until the copy signed and dated by designated facility is received.)
- c. Does generator retain a copy of each manifest for three years that was signed and dated by a representative of the designated facility? **KAR 28-31-4(f)(1)(A) [359]** ☒ ☐ ☐
- d. If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? **KAR 28-31-4(f)(4)(B) [360]** ☐ ☐ ☒
1. If yes, was a copy retained for three years? **KAR 28-31-4(f)(1)(B) [361]** ☐ ☐ ☒

LAND DISPOSAL RESTRICTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GLB)

YES NO NA V#

19. If the generator's waste is **not** subject to the Land Disposal Restrictions regulations, please explain why: _____
20. If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **KAR 28-31-14/40 CFR 268.7(a)(2) [365]** ☒ ☐ ☐
- a. Did the notice include: EPA hazardous waste numbers (waste codes) **[366]**, manifest number **[367]**, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) **[368]**, wastewater or non-wastewater classification **[369]**, waste subcategory (if any) **[370]**, and waste analysis data, if available **[371]**? **KAR 28-31-14/40 CFR 268.7(a)(2)** ☒ ☐ ☐
21. If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(3) [372]** ☐ ☐ ☒
- a. Did the notice include: EPA hazardous waste numbers (waste codes) **[366]**, manifest number **[367]**, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) **[368]**, wastewater or non-wastewater classification **[369]**, waste subcategory (if any) **[370]**, and waste analysis data, if available **[371]**? **KAR 28-31-14/40 CFR 268.7(a)(2)** ☐ ☐ ☒
22. If the generator treated waste in tanks or containers to meet applicable treatment standards:
- a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(5) [373]** ☐ ☐ ☒
- b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? **KAR 28-31-14/40 CFR 268.7(a)(5)(iii) [374]** ☐ ☐ ☒

23. Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site?

KAR 28-31-14/40 CFR 268.7(a)(8) [375]

☒ ☐ ☐

24. If the generator claims that his characteristic waste, including all applicable underlying hazardous constituents, is no longer hazardous:

- a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files?

KAR 28-31-14/40 CFR 268.9(d) [376]

☐ ☐ ☒

- b. Is the information on the notice and certification current?

KAR 28-31-14/40 CFR 268.9(d) [377]

☐ ☐ ☒

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations under "additional information".

SPECIAL CONDITIONS (GSC)

YES NO NA V#

25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?

☐ ☐ ☒

If hazardous waste was shipped/received to/from a foreign source, please describe under "additional information".

KANSAS GENERATOR'S EMERGENCY PREPAREDNESS REQUIREMENTS (GPT)

26. Has generator designated at least one employee as an emergency coordinator?

KAR 28-31-4(h)(6) [381]

☒ ☐

- a. Is the emergency coordinator on the premises or available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6) [382]**

☒ ☐

- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9) [383]**

☒ ☐

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7) [384]**

- a. Name and telephone number of emergency coordinator(s)?

KAR 28-31-4(h)(7)(A) [385]

☒ ☐

- b. Location of fire extinguishers and spill-control material, and if available, fire alarms?

KAR 28-31-4(h)(7)(B) [386]

☒ ☐

- c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C) [387]**

☒ ☐

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8) [388]**

☒ ☐

HAZARDOUS WASTE REPORTING REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GRR)

29. Has Kansas generator submitted an annual monitoring fee to KDHE?

KAR 28-31-10(g)(3) [392]

☒ ☐ ☐

30. Has EPA generator submitted an annual monitoring fee and report to KDHE?
KAR 28-31-4(f)(3) [396] ☐ ☐ ☒
31. Has EPA generator submitted biennial report(s) to KDHE?
KAR 28-31-4(f)(2)(A) [397] ☐ ☐ ☒
 a. Does generator retain a copy of the report for three years?
KAR 28-31-4(f)(1)(B) [398] ☐ ☐ ☒

PREPAREDNESS AND PREVENTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

YES NO NA V#

32. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? **KAR 28-31-4(g)(4) [418] or KAR 28-31-4(h)(5)/40 CFR 265.31 [402]** ☒ ☐ ☐
33. If appropriate, based upon the nature and quantity of each waste generated and stored at the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? **KAR 28-31-4(g)(4) [419] or KAR 28-31-4(h)(5)/40 CFR 265.32(a) [403]** ☒ ☐ ☐
- b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? **KAR 28-31-4(g)(4) [420] or KAR 28-31-4(h)(5)/40 CFR 265.32(b) [404]** ☒ ☐ ☐
- c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? **KAR 28-31-4(g)(4) [421] or KAR 28-31-4(h)(5)/40 CFR 265.32(c) [405]** ☒ ☐ ☐
- d. Water of adequate volume and pressure to supply hose streams, foam producing equipment, automatic sprinklers, and water spray systems? **KAR 28-31-4(g)(4) [422] or KAR 28-31-4(h)(5)/40 CFR 265.32(d) [406]** ☒ ☐ ☐
34. Is the equipment (32a-32c above) tested and maintained to ensure its proper operation? **KAR 28-31-4(g)(4) [423] or KAR 28-31-4(h)(5)/40 CFR 265.33 [407]** ☒ ☐ ☐
35. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? **KAR 28-31-4(g)(4) [424] or KAR 28-31-4(h)(5)/40 CFR 265.35 [408]** ☒ ☐ ☐
36. As appropriate, for each type of waste handled, has the generator attempted to make the following arrangements:
- a. Familiarized the local emergency authorities with the facility, properties and hazards of each waste handled, locations of workers, entrances to facility roads and possible evacuation routes? **KAR 28-31-4(g)(4) [425] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(1) [409]** ☒ ☐ ☐
- b. Designated one authority where one or more police or fire departments might respond to an emergency? **KAR 28-31-4(g)(4) [426] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(2) [410]** ☒ ☐ ☐
- c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? **KAR 28-31-4(g)(4) [427] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(3) [411]** ☒ ☐ ☐
- d. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions, or releases at the facility? **KAR 28-31-4(g)(4) [428] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(4) [412]** ☒ ☐ ☐

37. Do personnel have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, when handling hazardous waste (unless such a device is not required under ' 265.32)?

KAR 28-31-4(g)(4) [429] or KAR 28-31-4(h)(5)/40 CFR 265.34 [413]

☒ ☐ ☐

38. In cases where local authorities decline to enter into such arrangements, is the refusal documented? **KAR 28-31-4(g)(4) [430] or KAR 28-31-4(h)(5)/40 CFR 265.37(b) [414]**

☐ ☐ ☒

(If Kansas Generator, stop here)

PERSONNEL TRAINING FOR EPA GENERATORS (GPT)

YES NO NA V#

39. Has the generator established a hazardous waste management training program?

KAR 28-31-4(g)(4)/40 CFR 265.16(a)(1) [434]

☐ ☐

- a. Is the program directed by a person trained in hazardous waste management?

KAR 28-31-4(g)(4)/40 CFR 265.16(a)(2) [435]

☐ ☐

- b. Are new personnel trained within six months after their employment or placement to a new position? **KAR 28-31-4(g)(4)/40 CFR 265.16(b) [436]**

☐ ☐

- c. Are new employees supervised until training is completed?

KAR 28-31-4(g)(4)/40 CFR 265.16(b) [437]

☐ ☐

- d. After initial training, are employees trained on an annual basis?

KAR 28-31-4(g)(4)/40 CFR 265.16(c) [438]

☐ ☐

- e. Does the generator maintain the following documents and records:

1. Job title for each position related to hazardous waste management and the name of the employee filling each job?

KAR 28-31-4(g)(4)/40 CFR 265.16(d)(1) [439]

☐ ☐

2. Written job description for each position?

KAR 28-31-4(g)(4)/40 CFR 265.16(d)(2) [440]

☐ ☐

3. Description of type and amount of both introductory and continuing training to be given each person, including the implementation of the contingency plan?

KAR 28-31-4(g)(4)/40 CFR 265.16(d)(3) [441]

☐ ☐

4. Records of training or job experience completed by facility personnel?

KAR 28-31-4(g)(4)/40 CFR 265.16(d)(4) [442]

☐ ☐

5. Are training records kept on all current employees until closure of all hazardous waste units and all past employees for three years from last date of employment? **KAR 28-31-4(g)(4)/40 CFR 265.16(e) [443]**

☐ ☐

CONTINGENCY PLAN FOR EPA GENERATORS (GPT)

YES NO NA V#

40. Does the generator have a contingency plan? **KAR 28-31-4(g)(4)/40 CFR 265.51(a) [447]**

☐ ☐

If yes,

- a. Does the plan list the name, home address, and phone numbers (home and office) of each designated emergency coordinator in the order in which they should be contacted? **KAR 28-31-4(g)(4)/40 CFR 265.52(d) [448]**

☐ ☐

- b. Is an emergency coordinator available at all times?

KAR 28-31-4(g)(4)/40 CFR 265.55 [449]

☐ ☐

- c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste?

KAR 28-31-4(g)(4)/40 CFR 265.52(a) [450]

☐ ☐

- d. Does the plan describe arrangements made with police, fire departments, hospitals, contractors, or any emergency response agency?

KAR 28-31-4(g)(4)/40 CFR 265.52(c) [451]

☐ ☐

- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? **KAR 28-31-4(g)(4)/40 CFR 265.52(e) [452]**

☐ ☐

- f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? **KAR 28-31-4(g)(4)/40 CFR 265.52(f) [453]**

☐ ☐

- g. Have copies of the plan and any revisions been provided to the police and fire departments, hospitals, and any emergency response agency that may respond to an emergency? **KAR 28-31-4(g)(4)/40 CFR 265.53(b) [454]**

☐ ☐

- h. If implementation of the plan has been required at the facility, did the generator submit a written report on the incident to the KDHE within 15 days after the incident?

KAR 28-31-4(g)(4)/40 CFR 265.56(j) [455]

☐ ☐ ☐

(If EPA Generator, stop here.)

V# = Violation Number
Checklist Revised July 30, 2010

ADDITIONAL INFORMATION AND CONCLUSIONS:

Additional Information if applicable:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE T/S/D FACILITY
COMPLIANCE INSPECTION REPORT**

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

Activity at Site

Treatment

- | | | |
|--|---|--|
| <input type="checkbox"/> Chem/Phys/Bio Treatment | <input type="checkbox"/> Incineration | <input type="checkbox"/> Thermal Treatment |
| <input type="checkbox"/> Containment Building | <input type="checkbox"/> Recycling/Recovery | <input type="checkbox"/> Volume Reduction |
| <input type="checkbox"/> Filtration | <input type="checkbox"/> Reprocessing | <input type="checkbox"/> Other |

Storage

- | | | |
|--|--|--------------------------------|
| <input checked="" type="checkbox"/> Containment Building | <input type="checkbox"/> Surface Impoundment | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Drums | <input type="checkbox"/> Tank(s) (complete applicable checklist) | |
| <input type="checkbox"/> Pile | | |

Disposal

- | | | |
|--|---|--|
| <input type="checkbox"/> Deep Well Injection | <input type="checkbox"/> Landfill | <input type="checkbox"/> Surface Impoundment |
| <input type="checkbox"/> Incineration | <input type="checkbox"/> Land Treatment | <input type="checkbox"/> Other |

Comments:

Waste Analysis Plan (DGS)

- | | YES | NO | NA |
|---|-------------------------------------|--------------------------|-------------------------------------|
| 1. Does facility maintain a copy of its waste analysis plan at the facility?
[264.13(b)/265.13(b)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. If yes, does the plan include: | | | |
| A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)(1))] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| B. Test methods which are used to test for these parameters?
[264.13(b)(2)/265.13(b)(2)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest?
[264.13(c)/265.13(c)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Security (DGS)

- | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|
| 2. Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| If no, | | | |
| a. Does the facility provide either of the following: | | | |
| A. A 24-hour surveillance system (TV monitoring or guards)?
[264.14(b)(1)/265.14(b)(1)]; OR | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)] ☒ ☐ ☐
- b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)] ☒ ☐

General Inspection Requirements (DGS)

3. Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)] ☒ ☐
4. Does the owner/operator keep the written inspection schedule at the facility? [264.15(b)(2)/265.15(b)(2)] ☒ ☐
5. Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)] ☒ ☐
6. Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)] ☒ ☐
7. Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)] ☒ ☐

Personnel Training (DGS)

8. Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]
- a. Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)] ☒ ☐
- b. Written job description for each position? [264.16(d)(2)/265.16(d)(2)] ☒ ☐
- c. Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)] ☒ ☐
- d. Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)] ☒ ☐

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

9. Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)] ☒ ☐
- If yes,
- a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)] ☒ ☐
- b. Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)] ☒ ☐
- c. Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)] ☒ ☐
- d. Does a check of the areas used to handle ignitable or reactive wastes show:
- A. Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)] ☐ ☒
- B. Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)] ☐ ☒
- C. Evidence of uncontrolled flammable fumes or gases in sufficient quantities

- to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)] ☐ ☒
- D. Evidence of any leakage from or corrosion of containers?
[264.17(b)(4)/265.17(b)(4)] ☐ ☒
10. For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)] ☒ ☐ ☐

Preparedness and Prevention (DPP)

11. Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31] ☐ ☒
12. If applicable to the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)] ☒ ☐ ☐
 - b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)] ☒ ☐ ☐
 - c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)] ☒ ☐ ☐
 - d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)] ☒ ☐ ☐
13. Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33] ☒ ☐ ☐
14. Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:
- a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)] ☒ ☐
 - b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)] ☒ ☐ ☐
15. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35] ☐ ☐ ☒
16. As appropriate for the type(s) of waste handled, has the owner/operator:
- a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)] ☒ ☐
 - b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)] ☒ ☐ ☐
 - c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)] ☒ ☐ ☐
 - d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)] ☒ ☐
17. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)] ☐ ☐ ☒

Contingency Plan and Emergency Procedures (DCP)

18. Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)] ☒ ☐
- a. If yes, does the plan:
- A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)] ☒ ☐
- B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)] ☒ ☐
- C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)] ☒ ☐
- D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)] ☒ ☐
- E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)] ☒ ☐
19. Is an emergency coordinator available at all times? [264.55/265.55] ☒ ☐
20. Has implementation of the plan been required at the facility? ☐ ☒
- a. If yes, was the facility required to submit a written report on the incident to the KDHE? ☐ ☐
- A. If yes, was the written report submitted? [264.56(j)/265.56(j)] ☐ ☐

Manifest System, Recordkeeping, and Reporting (DMR)
--

21. Does the facility receive waste from off-site? [264.71/265.71] ☐ ☒
- a. If yes, does the owner/operator:
- A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)] ☐ ☐
- B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)] ☐ ☐
- C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)] ☐ ☐
- D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)] ☐ ☐
- E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)] ☐ ☐
22. Does the facility receive any waste from a rail or water (bulk shipment transporter)? ☐ ☒
- a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)] ☐ ☐
- If yes, does the owner/operator:
- A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)] ☐ ☐
- B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)] ☐ ☐
- C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)] ☐ ☐
- D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)] ☐ ☐
- C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)] ☐ ☐
23. Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72] ☐ ☒
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)] ☐ ☐
- A. If the discrepancy was not reconciled within 15 days, did the

- owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)] ☐ ☐
24. Does the owner/operator keep a written operating record at the facility?
[264.73(a)/265.73(a)] ☒ ☐
- a. If yes, does the operating record include:
- A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)] ☒ ☐
 - B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)] ☒ ☐
 - C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)] ☒ ☐
 - D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)] ☒ ☐
 - E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)] ☒ ☐
 - F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)] ☒ ☐
 - G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)] ☐ ☒
 - H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)] ☒ ☐
 - I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)] ☒ ☐
 - J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)] ☒ ☐ ☐
25. Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75] ☒ ☐
- a. If yes, does the report include:
- A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)] ☒ ☐
 - B. The calendar year covered by the report? [264.75(b)/265.75(b)] ☒ ☐
 - C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)] ☒ ☐
 - D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)] ☒ ☐
 - E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)] ☒ ☐
- b. If yes and the facility receives waste from off-site facilities, does the report include:
- A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)] ☐ ☐ ☒
 - B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)] ☐ ☐ ☒
- c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators? [264.75(c)/265.75(c)] ☐ ☐ ☒
- d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:
- A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)] ☐ ☐ ☒
 - B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)] ☐ ☐ ☒
26. Has the facility accepted any waste not accompanied by a manifest or shipping papers? ☐ ☒
- a. If yes, was the shipment excluded from manifest/shipping paper requirements? ☐ ☐

- A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76]

☐ ☐

Closure and Post-Closure (DCL)

27. Does the owner/operator have a written closure plan for the facility?
[264.112(a)/265.112(a)] ☒ ☐
- a. If yes, does the plan include:
- A. A description of how and when the facility will be closed?
[265.112(b)/265.112(b)] ☒ ☐
- B. A description of the steps necessary to completely close the facility?
[264.112(b)(2)/265.112(b)(2)] ☒ ☐
- C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)] ☒ ☐
- D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)] ☒ ☐
- E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)] ☒ ☐
- F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)] ☒ ☐
28. Is the facility a disposal facility? ☐ ☒
- a. If yes, does the owner/operator have a written post-closure plan?
[264.118(a)/265.118(a)] ☐ ☐
- If yes, does the plan include:
- A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)] ☐ ☐
- B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?
[264.118(c)(2)/265.118(c)(2)] ☐ ☐
- C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)] ☐ ☐

Financial Requirements (DFR)

29. Does the owner/operator have a written estimate of the closure cost?
[264.142(a)/265.142(a)] ☒ ☐
30. Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143] ☒ ☐
31. Is the facility a disposal facility? ☐ ☒
- a. If yes, has the owner/operator:
- A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)] ☐ ☐
- B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145] ☐ ☐
- C. Obtained liability insurance for nonsudden and accident occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? [264.147(b)/265.147(b)] ☐ ☐

32. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? [264.147(a)/265.147(a)]

☒ ☐

Management of Containers (DMC)

33. Are containers presently used to store hazardous waste? **No waste currently in storage**

☐ ☒

If yes,

- | | | | |
|---------|--|--------------------------|--------------------------|
| a. | Are the containers in good condition? [264.171/265.171] | <input type="checkbox"/> | <input type="checkbox"/> |
| b. | Are the containers compatible with the waste? [264.172/265.172] | <input type="checkbox"/> | <input type="checkbox"/> |
| c. | Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173] | <input type="checkbox"/> | <input type="checkbox"/> |
| d. | Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174] | <input type="checkbox"/> | <input type="checkbox"/> |
| e. | Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174] | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, | | | |
| A. | Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)] | <input type="checkbox"/> | <input type="checkbox"/> |
| B. | Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)] | <input type="checkbox"/> | <input type="checkbox"/> |
| C. | Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)] | <input type="checkbox"/> | <input type="checkbox"/> |
| D. | Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)] | <input type="checkbox"/> | <input type="checkbox"/> |
| E. | Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)] | <input type="checkbox"/> | <input type="checkbox"/> |
| f. | Does the storage area store containers holding only wastes that do not contain free liquids? | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes, | | | |
| A. | Are the containment system requirements of 264.175(b)/265.175(b) met? | <input type="checkbox"/> | <input type="checkbox"/> |
| If no, | | | |
| i. | Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR | <input type="checkbox"/> | <input type="checkbox"/> |
| ii. | Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)] | <input type="checkbox"/> | <input type="checkbox"/> |
| g. | Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176] | <input type="checkbox"/> | <input type="checkbox"/> |
| h. | If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)] | <input type="checkbox"/> | <input type="checkbox"/> |

TSDf checklist converted 03/21/07 from Word Perfect document - TSD Checklist Revised 9/98, Revised 7/30/10 to meet current format, but no substantive changes or review were conducted.

Additional Information and Conclusions:

SUBPART C USED OIL GENERATOR COMPLIANCE INSPECTION REPORT

	Off-Spec Used Oil	On-Spec Used Oil	Oil Filters
Types of Oils: (i.e. motor oil, cooling oil, cutting oil, compressor oil)	See Waste Stream Table		
Amount generated per month:			
Amount received from off-site sources:			
Amount presently in storage:			
Accumulation time:			
Present recycling methods:			
Name of UO Transporter			

YES NO NA V#

1. If the generator mixes hazardous waste with used oil without managing the mixture as hazardous waste, does the facility fall under the SQG exemption?
K.A.R. 28-31-4(p)

☐ YES ☐ NO ☒ NA ☐ V#

2. If the generator stores used oil on-site:
 - a. Is the storage unit(s) in good condition? **KAR 28-31-16(a)/40 CFR 279.22(b)**

☒ YES ☐ NO ☐ NA
 - b. Is the storage unit(s) free from leaks? **KAR 28-31-16(a)/40 CFR 279.22(b)**

☒ YES ☐ NO ☐ NA
 - c. Is the storage unit(s) and/or fill pipe(s) clearly labeled with the words "USED OIL"? **KAR 28-31-16(a)/40 CFR 279.22(c)** (If storage unit(s) is labeled "Waste Oil", simply make a comment that they should be re-labeled "Used Oil.")

☒ YES ☐ NO ☐ NA

3. If there has been a release of used oil:
 - a. Was the leak stopped? **KAR 28-31-16(a)/40 CFR 279.22(d)(1)**

☐ YES ☐ NO ☒ NA
 - b. Was the release contained? **KAR 28-31-16(a)/40 CFR 279.22(d)(2)**

☐ YES ☐ NO ☒ NA
 - c. Was the release cleaned-up and managed properly?
KAR 28-31-16(a)/40 CFR 279.22(d)(3)

☐ YES ☐ NO ☒ NA
 - d. If necessary, was the storage unit repaired or replaced?
KAR 28-31-16(a)/40 CFR 279.22(d)(4)

☐ YES ☐ NO ☒ NA

4. If the generator burns used oil on-site in a space heater,
 - a. Does generator burn only used oil that the generator/operator generates or used oil received from household do-it-yourself used oil generators, or used oil from any source that has been determined to be on-spec?
KAR 28-31-16(a)/40 CFR 279.23(a)

☐ YES ☐ NO ☒ NA
 - b. Is the space heater designed to have a maximum capacity of not more than 0.5 million Btu per hour? **KAR 28-31-16(a)/40 CFR 279.23(b)**

☐ YES ☐ NO ☒ NA
 - c. Are the combustion gases from the space heater vented to the ambient air? **KAR 28-31-16(a)/40 CFR 279.23(c)**

☐ YES ☐ NO ☒ NA

- | | YES | NO | NA | V# |
|---|--------------------------|--------------------------|-------------------------------------|----|
| 5. If the generator self-transportes used oil to an approved collection site or to an aggregation point owned by the generator, | | | | |
| a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? KAR 28-31-16(a)/40 CFR 279.24(a)(1) or 40 CFR 279.24(b)(1) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| b. Does the generator transport no more than 55 gallons of used oil at any time? KAR 28-31-16(a)/40 CFR 279.24(a)(2) or 40 CFR 279.24(b)(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

NOTE: IF NO TO QUESTION 5-a OR 5-b, COMPLETE USED OIL TRANSPORTER CHECKLIST.

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--|
| 6. If the generator has their used oil reclaimed under a tolling (contractual) agreement, | | | | |
| a. Does the tolling (contractual) agreement indicate the type of used oil and the frequency of shipments? KAR 28-31-16(a)/40 CFR 279.24(c)(1) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| b. Is the vehicle used to transport the used oil to the processing/re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor/re-refiner?
KAR 28-31-16(a)/40 CFR 279.24(c)(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| c. Is reclaimed oil returned to the generator?
KAR 28-31-16(a)/40 CFR 279.24(c)(3) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 7. Does the generator use a used oil transporter who is registered with KDHE?
K.A.R. 28-31-16(a)/40 CFR 279.24
Name of Transporter: <u>Universal Lubricants</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

V# = Violation Number

Used Oil Generator Checklist Revised July 30, 2010

WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Waste Type (HW, SW, UW, UO, EX, ND)	If HW, list all codes	Waste Det. Method (PK, AD, or ND)	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Attachment # if attaching documents pertinent to this waste stream
				Amount	Units				
EPA 2000 Solvent – Generated In Parts Washers Located In Firing Range Classroom and Oil Room	HW	D006, D008	AD	20 Gallons Per Year	Gallons	None	Not Applicable	Univar	
Film Fixer From Radiography Lab – Generated During Re-Fueling Outages	HW	D011	AD	10-15 Gallons Per Year	Gallons	None	Not Applicable	Univar	
Lab Pack Wastes (Aerosols) – Generated Plant Wide	HW	D001	AD	One 20-Gallon Lab Pack Per Year	20-Gallon Lab Pack	One Partially Filled 20-Gallon Lab Pack – Satellite Accumulation Container	Not Applicable	Univar	
Red Flex Insulation	HW	D008	AD	25 Pounds Per Year	Pounds	None	Not Applicable	Univar	
Monoethylamine – Used In Chemistry Turbine Lab For Low Level Sodium Reagent	HW	D001	AD	15 Gallons Per Year	Gallons	One Plastic Five-Gallon Container	02-07-11	Univar	
Paint Solids With MEK – Generated In Painting Building and Outage Support Area	HW	D001, D005, D007, D008, D018, and D035	AD	Five Gallons Per Year	Gallons	Two Partially Filled 20-Gallon Containers – Satellite Accumulation Containers	Not Applicable	Univar	

WASTE STREAM TABLE

Waste Description or Process	Waste Type (HW, SW, UW, UO, EX, ND)	If HW, list all codes	Waste Det. Method (PK, AD, or ND)	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.))	Attachment # if attaching documents pertinent to this waste stream
				Amount	Units				
Silver Nitrate – Lab Processes/Analyses – Generated In Chemistry Shop Lab	HW	D011	AD	<One Pound Per Year	Pounds	One Partially Filled 20-Gallon Container – Satellite Accumulation Container	Not Applicable	Univar	
Lead Contaminated Gun Patches – Generated In Firing Range Classroom and Basement of Security Building	HW	D009	AD	30 Pounds Per Year	Pounds	Two Partially Filled 20-Gallon Containers – Satellite Accumulation Containers	Not Applicable	Univar	
Lab Pack Wastes (Toxics)	HW	D005, D006, D007, D008, D018, D035	AD	Ten Pounds Per Year	Pounds	One Partially Filled 20-Gallon Container – Satellite Accumulation Container	Not Applicable	Univar	
Lab Pack Wastes (Ignitable)	HW	D001	AD	50 Pounds Per Year	Pounds	One Partially Filled 20-Gallon Container – Satellite Accumulation Container	Not Applicable	Univar	

WASTE STREAM TABLE

Waste Description or Process	Waste Type (HW, SW, UW, UO, EX, ND)	If HW, list all codes	Waste Det. Method (PK, AD, or ND)	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.))	Attachment # if attaching documents pertinent to this waste stream
				Amount	Units				
Hazardous Waste Sampling Equipment – Generated In 90-Day Hazardous Waste Storage Area	HW	All Waste Codes	AD	<Five Pounds Per Year	Pounds	One Partially Filled 55-Gallon Container – Satellite Accumulation Container	Not Applicable	Univar	
Battery Post Cleaning Solids – Generated In Field	HW	D008	AD	Five Pounds Per Year	Pounds	One Plastic Five-Gallon Container	01/27/11	Univar	
Paint Related Waste – Brushes, Rollers, Filters, Paint Contaminated Gloves	HW	D005, D007, D008	AD	Five Pounds Per Year	Pounds	Two Partially Filled 20-Gallon Containers – Satellite Accumulation Containers	Not Applicable	Univar	
Ignitable Liquids – Generated Throughout Facility	HW	D001, D008, D035	AD	50 Gallons Per Year	Gallons	None	Not Applicable	Univar	
Parts Washer Solvent From Two 30-Gallon Parts Washers – Located In Machine Shop	EX		Not Applicable	30 Gallons Every Three Months	Gallons	None	Not Applicable	Safety-Kleen Continued Use Program	
Batteries (Cell and 12 Volt) – Generated Throughout Facility	EX		PK	Three Pallets Per Year	Pallets	Two and a Half Pallets	Not Applicable	Recycled – Ash Battery	
Ni-Cad Batteries – Generated In Tool Room	EX		PK	50 Pounds Per Year	Pounds	None	Not Applicable	Recycled - Univar	

WASTE STREAM TABLE

Waste Description or Process	Waste Type (HW, SW, UW, UO, EX, ND)	If HW, list all codes	Waste Det. Method (PK, AD, or ND)	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.))	Attachment # if attaching documents pertinent to this waste stream
				Amount	Units				
Antifreeze – Generated In Vehicle Maintenance Shop and From Emergency Diesel Generators	EX		PK	Two 55-Gallon Drums Per Year	55-Gallon Drums	One Partial 55-Gallon Drum	Not Applicable	Universal Lubricants	
Shop Rags – Generated Throughout Facility	EX		PK	4,000 Per Year	Rags	One Full 55-Gallon Drum	Not Applicable	Cintas	
Used Oil	UO		PK	2,000 Gallons Per Year	Gallons	≈2,000 Gallons	Not Applicable	Universal Lubricants	
Used Oil Filters/Oily Rags/Diesel Filters	SW		PK	20 55-Gallon Drums Per Year	55-Gallon Drums	Five 55-Gallon Drums	Not Applicable	Drained and Disposed At Coffey County MSWLF Under SWDA - #10-0256	
Waste Pallets/Scrap Wood Waste	SW		PK	One 40 Cubic Yard Roll-Off	40 Cubic Yard Roll-Off	One Partial 40 Cubic Yard Roll-Off	Not Applicable	Green Environmental Solutions	
Sandblast Media	SW		AD	100 Tons Per Year	Tons	None	Not Applicable	Self Transported And Disposed At Coffey County MSWLF Under SWDA - #10-1002	
Waste Charcoal	SW		AD	20 55-Gallon Drums Per Year	55-Gallon Drums	None	Not Applicable	Self Transported And Disposed At Coffey County MSWLF Under SWDA - #10-0999	

WASTE STREAM TABLE

Waste Description or Process	Waste Type (HW, SW, UW, UO, EX, ND)	If HW, list all codes	Waste Det. Method (PK, AD, or ND)	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Attachment # if attaching documents pertinent to this waste stream
				Amount	Units				
Water Treatment Resin	SW		AD	60 Cubic Yards Per Year	Cubic Yards	None	Not Applicable	Contract Hauled And Disposed At Coffey County MSWLF Under SWDA-- #10-0997	
General Trash	SW		PK	≈170 Tons Per Year	Tons	Unknown	Not Applicable	Self Transported And Disposed At Coffey County MSWLF	

PK = Process Knowledge
 AD = Analytical Data
 HW = Hazardous Waste
 SW = Solid Waste
 UW = Universal Waste
 ND = Not Determined
 UO = Used Oil
 EX = Exempt (includes CUP, laundered rags, etc.)